

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Big Lots, Inc., <i>et al.</i> ¹ <div style="text-align: right; padding-right: 20px;">Debtors.</div>)))))))	Chapter 11 Case No. 24-11967 (JKS) (Jointly Administered) Relating to Docket No. 870
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CERTIFICATION OF COUNSEL

The undersigned counsel to Blue Owl Real Estate Capital LLC (“Blue Owl”) hereby certifies to the following:

1. On November 4, 2024, Blue Owl filed *Blue Owl Capital LLC's Emergency Motion to Extend Challenge Period and Remove Blanket "Professional Eyes Only" Designation from Productions or, in the Alternative, Appoint an Examiner* [Docket No. 870] (the “Motion”)² and *Motion of Blue Owl Real Estate Capital LLC to Shorten Notice of Its Emergency Motion to Extend Challenge Period* [Docket No. 871] (the “Motion to Shorten”).

2. On November 4, 2024 the Court entered the Order Shortening Notice Of Blue Owl Real Estate Capital LLC'S Emergency Motion To Extend Challenge Period [Docket No. 882].

3. On November 5, 2024, the Court held a hearing to consider the Motion and objections thereto (the “Hearing”).

¹ The debtors and debtors in possession in these chapter 11 cases (the “*Debtors*”), along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

4. Blue Owl have revised the proposed order filed with the Motion to conform to ruling by the Court at the Hearing (the “Revised Proposed Order”). A copy of the Revised Proposed Order is attached hereto as **Exhibit A**. A redline of the Revised Proposed Order marked to reflect the changes from proposed order filed with the Motion is attached hereto as **Exhibit B**.

5. Blue Owl has circulated the Revised Proposed Order to counsel for the United States Trustee, counsel to the Debtors, counsel to the official committee of unsecured creditors, counsel to PNC Bank, N.A., and counsel to 1903P Loan Agent, LLC and each has confirmed that they have no objection to the entry of the Revised Proposed Order in the form attached hereto as **Exhibit A**.

WHEREFORE, Blue Owl respectfully requests that the Court enter the Revised Proposed Order in the form attached hereto as **Exhibit A** at the Court’s earliest convenience.

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Date: November 8, 2024
Wilmington, Delaware

KLEHR HARRISON HARVEY BRANZBURG LLP

/s/ Domenic E. Pacitti

Domenic E. Pacitti (DE Bar No. 3989)
919 North Market Street, Suite 1000
Wilmington, Delaware 19801
Telephone: 302-552-5511 |
Facsimile: 302-426-9193
Email: dpacitti@klehr.com

-and-

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Benjamin Finestone (admitted *pro hac vice*)
Victor Noskov (admitted *pro hac vice*)
Zachary Russell (admitted *pro hac vice*)
Joanna D. Caytas (admitted *pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: 212-849-7000
Facsimile: 212-849-7100
Email: benjaminfinestone@quinnemanuel.com
victornoskov@quinnemanuel.com
zacharyrussell@quinnemanuel.com
joannacaytas@quinnemanuel.com

Counsel for Blue Owl Real Estate Capital LLC